



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

NOV 29 2016

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**Article Number: 7016 2070 0001 1397 9289**

Jack Lipsett, City Administrator  
City of Gloucester  
512 Monmouth Street  
Gloucester City, New Jersey 08030

Fred Schindler, Director  
City of Gloucester  
512 Monmouth Street  
Gloucester City, New Jersey 08030

**Re: Request for Information (“RFI”) Pursuant to Section 308 of the Clean Water Act  
City of Gloucester Municipal Separate Storm Sewer System (“MS4”)  
NJPDES ID No. NJG0149497  
Docket No. CWA-IR-17-010**

Dear Messrs. Lipsett and Schindler:

The United States Environmental Protection Agency (“EPA”) is charged with the protection of human health and the environment under the Clean Water Act (“CWA” or “Act”), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, the EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

The City of Gloucester is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to the EPA the following no later than **twenty-one (21) calendar days** of receipt of this RFI:

1. The City’s program or process for ensuring proper operation and maintenance for privately and municipally owned best management practices (“BMPs”), as well as maintaining records of maintenance pursuant to Ordered Provision C.2.h of CWA-02-2014-3007 (“Order”) which was issued on December 4, 2014.
2. The City’s plan to conduct regular inspections of all municipal maintenance yard operations as required by Section F.1 of Attachment D of the Permit pursuant to Ordered Provision C.2.i of the Order.
3. Documentation of the City’s MS4 outfall inspections pursuant to Ordered Provision C.2.k of the Order.
4. The City’s written procedures or formal program documenting its illicit connection detection and elimination program pursuant to Ordered Provision C.2.l of the Order.
5. The City’s updated Stormwater Pollution Prevention Plan (“SPPP”) that incorporates additional Statewide Basic Requirements, BMPs, and other changes required by the renewal of the Tier A Municipal Stormwater General Permit pursuant to Ordered Provision C.2.m of the Order.
6. The City’s stormwater outfall pipe scouring detection, remediation and maintenance program pursuant to Ordered Provision C.2.o of the Order.

7. Employee training program that ensures employee training is regularly scheduled and documented pursuant to Ordered Provision C.2.p of the Order.
8. Progress report summarizing activities taken and general costs associated with compliance from the date of issuance to the present day pursuant to Ordered Provision C.2.r of the Order.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to the following address:

Doughlas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
290 Broadway, 20th Floor  
New York, NY 10007-1866

Any documents to be submitted by the City shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the City to ineligibility for participation in work associated with Federal contracts, grants or loans.

If you have any questions regarding this letter, please feel free to contact Justine Modigliani, Compliance Section Chief at (212) 637-4268.

Sincerely,



Doughlas McKenna, Chief  
Water Compliance Branch

cc: Marcedius T. Jameson, Administrator, Water and Land Use Enforcement, NJDEP  
Mary Simpson, NJDEP Southern Bureau (Mary.Simpson@dep.nj.gov)